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*Counsel for Plaintiff, PacketFabric, Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

PACKETFABRIC, INC.,

Plaintiff,

v.

DAVID WARD, an individual; ROE  
ENTITIES I through X; and DOES I through  
X, inclusive,

Defendants.

Case No. 2:24-cv-00618-GMN-EJY

**STIPULATION TO EXTEND TIME FOR DEFENDANT TO RESPOND TO  
PLAINTIFF'S COMPLAINT**  
[SECOND REQUEST]

Pursuant to Local Rule 7-1, Plaintiff PACKETFABRIC, INC. ("Plaintiff") and Defendant DAVID WARD ("Defendant") by and through their respective counsel (collectively, the "Parties"), hereby stipulate and agree as follows:

WHEREAS, the Complaint in this matter was filed on February 23, 2024, and served on Defendant on February 27, 2024; and

WHEREAS, this case was removed to this federal court on March 28, 2024 when a Petition for Removal and related pleadings were filed by Defendant; and

1 WHEREAS prior to removal of the case, the Parties stipulated to extend the time  
2 for a response to the Complaint to be filed and served to April 16, 2024 in order to allow  
3 the Parties to engage in discussions about resolution of the case; and

4 WHEREAS the Parties have reached a tentative agreement which is in the process  
5 of being reduced to a written release agreement;

6 WHEREAS it has taken more time than anticipated to finalize the written  
7 settlement agreement; and

8 WHEREAS, there has been one prior extension of the deadline for Defendant's  
9 response to the Complaint;

10 NOW, THEREFORE, Plaintiff and Defendant stipulate and agree that good cause  
11 exists for an extension of time for Defendant to respond to Plaintiff's Complaint until  
12 **May 7, 2024.**

13 **IT IS SO STIPULATED.**

14 DATED this 16<sup>th</sup> day of April, 2024

15 **KLINEDINST PC**

16 /s/Teresa M. Beck

17 TERESA M. BECK, ESQ.  
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20 San Diego, California 92101  
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22 ***Counsel for Defendant***

DATED this 16<sup>th</sup> day of April, 2024

**GREENBERG TRAURIG, LLP**

/s/Eric Swanis

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***Counsel for Plaintiff***

23 **IT IS SO ORDERED.**

24   
25 THE HONORABLE ELAYNA J. YOUCHAH  
26 United States Magistrate Judge

27 Date: April 16, 2024